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Attorney for Laura A. Gaddy and the Class

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

LAURA A. GADDY, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST
OF LATTER-DAY SAINTS, a Utah
corporation sole,

Defendant.

**ERRATA TO [PROPOSED]
SECOND AMENDED COMPLAINT
(2AC). Filed as Ex. 1 to
“PLAINTIFF’S MOTION FOR
LEAVE TO FILE PROPOSED
SECOND AMENDED
COMPLAINT”**

2:19-cv-554-RJS-DBP

Chief District Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

Plaintiff corrects the [Proposed] Second Amended Complaint, filed as Exhibit One [ECF #85-1] to “Plaintiff’s Motion for Leave to File the Proposed Second Amended Complaint” [ECF #85, filed March 17, 2021] as follows:

- ¶73, p. 24, “Perpetual Immigration Fund,” should be “Perpetual **Education** Fund.”
- ¶95, p. 28, The diagram showing the “Nonprofit” side of the Mormon Corporate Empire indicates “8 Qs of Seventy.” That number should read “**12** Qs of Seventy.”¹

¹ Four more Quorums of the Seventy were added after the Complaint was filed on Aug. 5, 2019.

- ¶110 The phrase “are indoctrinated for two months,” should be: “are indoctrinated for **an average of** two months.”
- ¶ 350, The phrase “Defendant’s conduct was a substantial factor in bringing about Plaintiffs’ injuries which are of a type that a reasonable person would foresee as a likely result of his or her conduct.” The phrase should read: “Defendant’s conduct was **an actual cause of, and substantially contributed to,** Plaintiffs’ injuries and damages which are of a type that a reasonable person would foresee as a likely result of his or her conduct.
- ¶ 358. The phrase: “The important facts that COP failed to disclose are the following:” should read: “The important facts that COP failed to disclose **include, but are not limited to** the following:”

Dated: March 31, 2021

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